

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

VINCENZO MAZZAMUTO,
Plaintiff,

v.

UNUM PROVIDENT CORPORATION;
PAUL REVERE LIFE INSURANCE
COMPANY; and NEW YORK LIFE
INSURANCE COMPANY
Defendants

CIVIL ACTION – LAW

NO. 1:CV-01-1157

JUDGE CONNER

JURY TRIAL DEMANDED

PLAINTIFF'S VOIR DIRE

1. Are you or any members of your immediate families or close personal friends in the insurance business?

2. Are you or any of your close relatives or close personal friends employees of or affiliated with New York Life Insurance Company, Paul Revere Insurance Company, UNUMProvident or Provident Insurance Company?

3. Do you or any of your close relatives or close personal friends have a contract or policy of insurance with New York Life Insurance Company, Paul Revere Insurance Company, UNUMProvident or Provident Insurance Company?

4. Have you or any of your close relatives or close personal friends been involved in a dispute with an insurance company for payment of benefits under the policy?

5. Have you or any of your close relatives ever sued for breach of contract or insurance bad faith for failure to pay proceeds of a policy of insurance?

6. Do any of you believe a person should not recover money if their breach of contract case is proved?

7. Do any of you believe that insurance companies should profit from refusing to pay the proceeds due under an insurance policy?

8. Do you or any close relatives or close personal friends own a business?

9. Are you or any of your close relatives or close personal friends involved in any restaurant business?

10. Do you, a member of your family, relative or friend have any education or training in the insurance business?

11. Are you or any members of your family or close friends employed in the investigation or processing of any type of insurance claims such as disability claims, accident and health insurance claims, social security claims, workers' compensation claims or similar matters?

12. Are you, or are any of your friends or relatives, employed in the business that investigates or adjusts claims for insurance companies or other corporations?

13. Is anyone an attorney?

14. Does anyone have a close family member who is an attorney?

15. Is anyone employed by an attorney or by a law firm?

16. Does anyone have a close family member who is employed by an attorney or by a law firm?

17. Have you or any member of your family ever been involved in litigation?

18. Have you read anything in newspapers or magazines or heard anything on the radio or television concerning insurance companies refusing to pay benefits? If so, can you be an impartial juror?

19. Is there anyone that feels he or she could not render a verdict for Vincenzo Mazzamuto even if the evidence and law were to support it because you feel sorry for the insurance companies?

KNOWLEDGE OF WITNESSES

20. Do any of you have personal knowledge of Mr. Vincenzo Mazzamuto?

21. Would that knowledge prevent you from rendering a fair verdict in this case?

22. The following people may be called to testify as witnesses in this matter. Do any of you know or have heard of the following potential witnesses:

- a) Gerarda Mazzamuto
- b) Melissa Mulry
- c) John Clarke, M.D.
- d) John W. Fogarty
- e) Antonino Mazzamuto
- f) Francesco Mazzamuto
- g) Angelo Mazzamuto
- h) Antonia Tripoli
- i) Pam Hagerich
- j) Vincenzo Randazzo
- k) James S. Marshall
- l) Therese A. Sindelar
- m) Salvatore Ferrigno
- n) Gordon K. Rose
- o) Douglas Bower, M.D.
- p) Stanley E. Schneider, Ed.D.
- q) Dr. Patrick Fergal McSharry
- r) Robert C. Steinman, M.D.
- s) Abram Hostetter, M.D.
- t) Ted Kasenske, M.D.

KNOWLEDGE OF OR RELATIONSHIP TO LAW FIRMS

23. Plaintiff, Vincenzo Mazzamuto, is represented by the law firm of Angino & Rovner, P.C. of Harrisburg and Defendants New York Life Insurance Company, Paul Revere Insurance Company, UNUMProvident or Provident Insurance Company are represented by E. Thomas Henefer and Kirk Wolgemuth of Stevens & Lee, Reading, PA.

24. Do any of you have any personal knowledge of or relationship with either of these law firms or any of their members?

25. If anyone has a personal knowledge of or relationship with either law firm or any of their members, would your personal knowledge or relationship prevent you from rendering a fair verdict?

26. If anyone has a personal knowledge of or a relationship with either law firm or any of their members, would you be more comfortable on another jury?

Respectfully submitted,

ANGINO & ROVNER, P.C.

s/Richard C. Angino

Richard C. Angino, Esquire

I.D. No. PA07140

Joan L. Stehulak, Esquire

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Attorney for Plaintiff

Dated: April 16, 2003